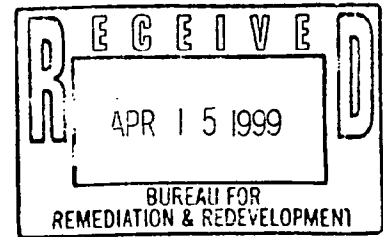


ATTACHMENT 34



**COMMENTS OF THE FOX RIVER GROUP ON THE WISCONSIN
DEPARTMENT OF NATURAL RESOURCES' DRAFT REMEDIAL
INVESTIGATION, BASELINE HUMAN HEALTH AND ECOLOGICAL
RISK ASSESSMENT AND DRAFT FEASIBILITY STUDY FOR THE
LOWER FOX RIVER**

VOLUME 1 OF 12

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Submitted By:

THE FOX RIVER GROUP

**Appleton Papers Inc.
Fort James Corporation
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Riverside Paper Company
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prey. However, other site-specific information indicates that the productivity of an eagle nest near the Fox River is the highest for all nests monitored in the state and field observations made in the spring of 1998 reported three eagle fledglings at a nest south of Little Lake Butte des Morts. These data do not support the risk hypothesis that PCBs are being accumulated in bald eagles near the Fox River to levels that are causing adverse reproductive effects. Furthermore, other studies have shown that other factors (DDE, habitat structure and availability, human disturbance, prey abundance, and low food delivery rates) are more likely to result in lowered bald eagle productivity than PCBs.

- The FRG's ecological risk assessment suggests there is a limited risk of reproductive risks to double-crested cormorants nesting in lower Green Bay at Cat Island. These conclusions are based on data from only 10 samples collected from the Cat Island colony over a two-year period and those samples indicate that other chemicals are responsible for 50 percent of the predicted risk. Further evidence exists to refute the hypothesis that PCBs are adversely affecting cormorant reproduction. Cormorant populations have shown a steady increase in Wisconsin and the Great Lakes, regardless of the presence of PCBs. Populations have been successfully breeding and expanding in Green Bay since 1976. These changes are suspected to be due to decreasing levels of DDE and other environmental contaminants, and to controls on killing of cormorants by commercial fisherman. Although deformities and embryo mortality have been observed in cormorants nesting in Lake Michigan and Green Bay, it was not possible to find a correlation between these effects and PCBs. Another study on reproductive effects in cormorants colonizing Cat Island showed that hatching success was not correlated with PCB concentrations. The results of this study suggest that adverse reproductive impacts experienced by the Cat Island colony were due to DDE.

8. The Draft RI/FS recommended a single sediment cleanup objective to be applied on a river-wide basis. This is not in keeping with the risk reduction objectives of the RI/FS guidance and the NCP, nor with sound principles for the application of risk assessment to risk management. A single, river-wide sediment criterion does not reflect actual risk, which varies with exposure at different places and times in the River. In sediments that are less bioaccessible (for example, those in deep, relatively anoxic and sparsely populated dredged channels), there is little biological exposure. At such locations, applying the sediment cleanup objective chosen by the Draft RI/FS provides no contribution to risk reduction.

The Draft RI/FS calculates its sediment cleanup objective by adapting and applying the bioaccumulation model developed by Gobas (1993). The Gobas model is